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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JEFFREY KAIN, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

ACM RESEARCH, INC., DAVID HUI  
WANG, LISA FENG, and MARK A.  
MCKECHNIE,

Defendants.

Case No.: 3:20-cv-09241-VC

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER REGARDING  
RESPONSE TO COMPLAINT**

1 WHEREAS, Plaintiff Jeffrey Kain (“Kain”) filed a complaint on December 21, 2020 (the  
2 “Complaint”), asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of  
3 1934 and SEC Rule 10b-5 on behalf of a putative class;

4 WHEREAS, the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, *et*  
5 *seq.*, requires the Court to appoint a Lead Plaintiff;

6 WHEREAS, the parties have agreed to a schedule that extends Defendants’ time to  
7 respond to the Complaint until after a Lead Plaintiff has been appointed and an amended  
8 complaint has been filed;

9 IT IS HEREBY STIPULATED AND AGREED among the undersigned parties, and  
10 respectfully submitted for the Court’s approval, as follows:

- 11 1. Defendants are not required to answer or otherwise respond to the current  
12 Complaint;
- 13 2. Within 14 days of the appointment of a Lead Plaintiff, the parties will confer and  
14 submit a proposed schedule for the filing of an amended complaint and  
15 Defendants’ response thereto;
- 16 3. The present stipulation is entered into without prejudice to or waiver of any rights,  
17 arguments, defenses, or other objections of the parties.

18  
19 Respectfully submitted,

20 Dated: February 17, 2021

FRESHFIELDS BRUCKHAUS DERINGER US LLP

21  
22 By: /s/ Boris Feldman  
23 Boris Feldman

24 *Attorneys for Defendants ACM Research, Inc.,*  
25 *David Hui Wang, Lisa Feng, and Mark A.*  
26 *McKechnie*

1 Dated: February 17, 2021

POMERANTZ LLP

2  
3 By: /s/ Patrick V. Dahlstrom  
Patrick V. Dahlstrom

4  
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25 *Additional Counsel for Plaintiff*  
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**CERTIFICATION**

I, Boris Feldman, am the ECF User whose identification and password are being used to file this **JOINT STIPULATION AND [PROPOSED] ORDER REGARDING RESPONSE TO COMPLAINT**. In compliance with Civil Local Rule 5-1(i), I hereby attest that Patrick V. Dahlstrom has concurred in this filing.

Dated: February 17, 2021

FRESHFIELDS BRUCKHAUS DERINGER US LLP

By: /s/ Boris Feldman  
Boris Feldman

*Attorneys for Defendants ACM Research, Inc.,  
David Hui Wang, Lisa Feng, and Mark A.  
McKechnie*

~~PROPOSED~~ ORDER

Pursuant to the Stipulation, IT IS SO ORDERED.

Dated: February 18, 2021

The Hon. Vince Chhabria  
United States District Judge

